

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

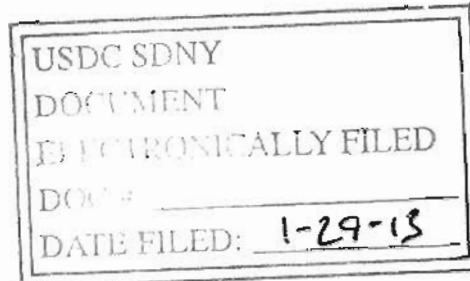
MARYLEBONE PCC LIMITED—ROSE 2  
FUND ON BEHALF OF ITSELF AND ALL  
SIMILARLY SITUATED PERSONS,

Plaintiff,

vs.

MILLENNIUM GLOBAL INVESTMENTS,  
LTD.; MILLENNIUM ASSET  
MANAGEMENT, LTD.; MICHAEL R.  
BALBOA; GLOBEOP FINANCIAL  
SERVICES, LTD.; BCP SECURITIES LLC;  
XYZ CORP.

Defendants.



Case No. 1:12-CV-03835-PAC

**STIPULATION AND ~~PROPOSED~~  
ORDER**

**STIPULATION AND PROPOSED ORDER EXTENDING TIME FOR DEFENDANT BCP  
SECURITIES LLC TO ANSWER, MOVE, OR OTHERWISE RESPOND TO PLAINTIFF'S  
AMENDED COMPLAINT**

**WHEREAS** Plaintiff Marylebone PCC Limited – Rose 2 Fund (“Plaintiff”) filed its  
Complaint on or about May 14, 2012;

**WHEREAS** Defendants Millennium Global Investments Limited and Millennium Asset  
Management Limited (together, “Millennium”), GlobeOp Financial Services, Ltd. (“GlobeOp”),  
and BCP Securities LLC (“BCP”) (collectively, “Defendants”) agreed to answer, move, or  
otherwise respond to the Complaint on or before July 31, 2012, pursuant to a court-ordered  
stipulation among the parties;

WHEREAS on July 25, 2012, Plaintiff and Defendants Millennium, GlobeOp, and BCP signed a Stipulation Extending Time for Defendants to Answer, Move, or Otherwise Respond to the Complaint to no later than November 2, 2012;

WHEREAS Plaintiff filed an amended complaint on August 31, 2012 (the "Amended Complaint");

WHEREAS on October 22, 2012, Plaintiff and BCP signed a Stipulation Extending Time for BCP to Answer, Move, or Otherwise Respond to the Amended Complaint no later than November 21, 2012;

WHEREAS on November 19, 2012, Plaintiff and BCP signed a Stipulation Extending Time for BCP to Answer, Move, or Otherwise Respond to the Amended Complaint no later than January 31, 2013;

WHEREAS BCP and Plaintiff have reached a settlement;

WHEREAS on December 20, 2012, the Plaintiff filed a Notice of Motion for Preliminary Approval of Settlement with Defendant BCP Securities LLC; and

WHEREAS this is BCP's third request for adjournment of the time to respond to the Amended Complaint.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, that:

(1) Defendant BCP shall have up to and including May 2, 2013 to answer, move, or otherwise respond to the Amended Complaint; and

(2) This Stipulation and Proposed Order is being filed for scheduling purposes, does not seek any relief from the Court, and does not waive any rights or defenses (including but not limited to personal jurisdiction defenses) that Defendant BCP may have with respect to the Complaint or Amended Complaint.

Dated: New York, New York  
January 28, 2013

**ZAMANSKY & ASSOCIATES LLC**

Jacob H. Zamansky (nm)  
Jacob H. Zamansky  
jake@zamansky.com  
Zamansky & Associates LLC  
50 Broadway, 32<sup>nd</sup> Floor  
New York, New York 10004  
Telephone: (212) 742-1414  
Fax: (212) 742-1177

*Attorneys for Plaintiff*

**BAKER & HOSTETLER LLP**

Deborah H. Renner  
Marc D. Powers  
mpowers@bakerlaw.com  
Mark A. Kornfeld  
mkornfeld@bakerlaw.com  
Deborah H. Renner  
drenner@bakerlaw.com  
Baker & Hostetler LLP  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201

*Attorneys for BCP Securities LLC*

SO ORDERED, this 29<sup>th</sup> day of January, 2013

Paul A. Crotty  
The Honorable Paul A. Crotty  
United States District Judge